

VERNER · LIIPFERT  
BERNHARD · MCPHERSON & HAND  
CHARTERED

EX PARTE OR LATE FILED

RECEIVED

MAY 6 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

901 - 15TH STREET, N.W.  
WASHINGTON, D.C. 20005-2301  
(202) 371-6000  
FAX: (202) 371-6279

Direct Dial: (202) 371-6326

May 6, 1999

Magalia R. Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 99-34, An Industry Coordination Committee System for  
Broadcast Digital Television Service  
Written *ex parte* Communication

Dear Ms. Salas:

This is to inform you that pursuant to Section 1.1206 of the Commission's rules, Philips Electronics North America Corporation submits two copies of the attached written *ex parte* presentation in the above-captioned proceeding. Copies of this presentation are being delivered today to Chairman Kennard, Commissioners Ness, Furchtgott-Roth, Powell and Tristani; and Messrs. Dale Hatfield, Bruce Franca, and Alan Stillwell of the Commission's Office of Engineering and Technology.

Please do not hesitate to contact the undersigned should you have any questions.

Sincerely yours,

*Lawrence R. Sidman*

Lawrence R. Sidman  
David R. Siddall

Enclosures

No. of Copies rec'd 0+1  
List A B C D E

## Digital Television Program and System Information Protocol

Philips Electronics North America Corporation (“Philips”), submits this information related to the Commission’s Notice of Proposed Rule Making (Notice) in ET Docket No. 99-34.<sup>1</sup>

### **INTRODUCTION**

The Commission sought comment in the Notice on establishing industry coordination committees and a national coordinator for the purpose of assisting it to evaluate various proposals that relate to implementing digital television (DTV) broadcasting. Among the issues specifically addressed by the Commission was whether such committees and coordinator should assist in the administration of the Program and System Information Protocol (PSIP) that governs transmission of system information and program guide data for each digital broadcast station.<sup>2</sup>

### **ASSIGNMENT OF PSIP IDENTIFIERS IS CRITICAL FOR CONSUMERS TO ACCESS THE FULL ARRAY OF FEATURES ENABLED BY DIGITAL BROADCASTING**

Philips Electronics North America Corporation designs, builds, and distributes consumer electronics devices intended to receive, decode, and display digital television (DTV) broadcast signals transmitted using the FCC-adopted DTV transmission standard. Such devices include, *inter alia*, television receivers, set-top boxes, and video recorders (VCRs).

Broadcast transmission and accurate decoding of PSIP information is necessary, *inter alia*, to identify and permit display of multiple program channels and data streams that

---

<sup>1</sup> *An Industry Coordination Committee System for Broadcast Digital Television Service, Notice of Proposed Rulemaking* in ET Docket No. 99-34, FCC 99-8 (rel. Feb. 3, 1999), *summarized*, 64 Fed. Reg. 6296 (Feb. 9, 1999).

<sup>2</sup> Notice at ¶18. *See also, System Information for Broadcast and Cable*, Advanced Television Systems Committee (ATSC) Doc. A/65, 23 Dec 1997.

broadcasters plan to carry with their digital signal; and to enable selection of programs and other information through consumer-friendly electronic program guides. These and related functions will work reliably for consumers only with sound administration and assignment of PSIP information.

Clearly the public interest requires enabling consumers to use all the features of their television receivers that are mandated by statute or otherwise provided for by the Commission's DTV Standard. Philips therefore urges the Commission to provide immediately for the accurate and reliable assignment to broadcasters of PSIP station identifiers known as "Transport Stream Identifiers" (TSIDs). When it transmitted the PSIP standard (A/65) to the Commission in March, 1998, the ATSC stated that the following specific actions by the Commission are required:

- For broadcasters with existing NTSC licenses, assign the current NTSC channel number as the major channel number.
- For new broadcasters without existing NTSC licenses, assign the DTV station's RF channel number as the major channel number.
- Assign a unique 16-bit MPEG Transport Stream Identifier (TSID) to each digital television station licensee.
- Coordinate assignments of major channel numbers and TSIDs with those assigned in Canada and Mexico<sup>3</sup>.

Philips agrees with the Comments of the Association of Maximum Service Television and the National Association of Broadcasters (MSTV/NAB) and the Consumer Electronics Manufacturers Association (CEMA) -- the only two parties addressing this issue in their comments -- that PSIP administration appropriately would be administered by the Commission

---

<sup>3</sup> Letter from Robert K. Graves, Chairman, ATSC, to Magalie Roman Salas, Secretary, FCC in Docket No. 87-268 (March 25, 1998).

itself as part of the DTV licensing process<sup>4</sup>. At a minimum, should the Commission decide to not administer PSIP itself, it must specify an accurate and reliable method for assigning major channel numbers and identifier codes to broadcasters.

Finally, Philips notes that MSTV has constructed a table of TSIDs. This, or one similar to it could be adopted by the Commission to govern its licensees.<sup>5</sup> Philips also notes that even if the Commission relies upon a voluntary coordinating committee for this purpose, it still must coordinate with Canada and Mexico to prevent duplication of identifiers. Private entities, such as voluntary committees, cannot coordinate with foreign governments and such coordination is necessary to ensure unimpaired reception of DTV signals in border areas.

### CONCLUSION

For the above-stated reasons, immediate action by the Commission to administer the PSIP, including the assignment of major channel numbers and TSIDs, would serve the public interest and is essential to ensure that digital consumer equipment will function properly. The Commission could accomplish this itself through its licensing process; by delegation to a coordinating committee; or by adopting a rule incorporating a table such as that constructed by MSTV.

---

<sup>4</sup> See Comments of the Association for Maximum Service Television, Inc. and the National Association of Broadcasters at 9; Comments of the Consumer Electronics Manufacturers Association (CEMA) at 3.

<sup>5</sup> See <http://www.mstv.org/bottdx.htm> (website visited April 28, 1999). We note that MSTV's table includes TSIDs for the corresponding analog NTSC channels to enhance the utility of those channels as well during the transition period.

Only by taking immediate and appropriate action will the Commission further its oft-repeated goal of “fostering an expeditious and orderly transition to digital technology that will allow the public to receive the benefits of digital television.”<sup>6</sup>

---

<sup>6</sup> *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Fifth Report and Order* in MM Docket No, 87-268, 12 FCC Rcd 12809, 12812 (1997).